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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 JAYLEN MARCUS BROWN,

Defendant.

Case:2:20-cr-20279

Judge: Drain, Gershwin A.

MJ: Stafford, Elizabeth A.

Filed: 06-25-2020 At 11:20 AM

INDI USA V. SEALED MATTER (DA)

Violations:

18 U.S.C. §§ 922(n), 924(a)(1)(D)

18 U.S.C. §§ 922(j), 924(a)(2)

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. §§ 922(n), 924(a)(1)(D) – Illegal Receipt of a Firearm
by a Person Under Indictment)

D-1 JAYLEN MARCUS BROWN

Between on or about January 16, 2020 and on or about February 6, 2020, in the Eastern District of Michigan, the defendant JAYLEN MARCUS BROWN, willfully received a firearm while under indictment for a crime punishable by imprisonment for a term exceeding one year, said firearm being a .40 caliber Glock

Model 23 Pistol with Serial Number XYB123 and having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT TWO

(18 U.S.C. §§ 922(j), 924(a)(2) – Possession of a Stolen Firearm)

D-1 JAYLEN MARCUS BROWN

On or about February 6, 2020, in the Eastern District of Michigan, the defendant JAYLEN MARCUS BROWN, knowingly possessed a stolen firearm, that is, a .40 caliber Glock Model 23 Pistol with Serial Number XYB123, which had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Two of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Counts One through Two of this Indictment, Defendant JAYLEN MARCUS BROWN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United

States Code, Section 2461(c), any firearm(s) and ammunition involved in or used in the knowing commission of the offense, including but not limited to: .40 caliber Glock Model 23 Pistol with Serial Number XYB123.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

ERIC STRAUS
Chief, Violent & Organized Crime Unit

s/ Andrew R. Picek
Andrew R. Picek
Assistant United States Attorney

Dated: June 25, 2020

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to co

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>AR</u>

Case Title: USA v. JAYLEN MARCUS BROWN

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 20-mj-30123]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
JAYLEN MARCUS BROWN	18 U.S.C. §§ 922(n), 924(a)(1)(D)	20-mj-30123
	18 U.S.C. §§ 922(j), 924(a)(2)	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 25, 2020

Date

Andrew R. Picek
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9652
 Fax: (313) 226-5464
 E-Mail address: Andrew.Picek@usdoj.gov
 Attorney Bar #: OH0082121

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.